

# REYNOLDS, CARONIA, GIANELLI & LA PINTA, P.C.

- ATTORNEYS AT LAW -

200 VANDERBILT MOTOR PARKWAY  
SUITE C-17  
HAUPPAUGE, NEW YORK 11788

300 OLD COUNTRY ROAD  
SUITE 341  
MINEOLA, NEW YORK 11501  
(Correspondence to Hauppauge Office)

ANTHONY M. LA PINTA  
JAMES T. REYNOLDS  
PETER R. CARONIA (Ret.)  
PAUL GIANELLI (Ret.)

TEL: 631-231-1199  
FAX: 631-300-4380

OF COUNSEL

PETER H. MAYER, III, PLLC.  
Justice, NYS Supreme Court (Ret.)

MARK D. COHEN  
Judge, NYS Court of Claims (Ret.)

CHRISTOPHER J. PURCELL, P.C.

MICHAEL E. FEHRINGER  
KYLE O. WOOD

**BY ECF**

June 10, 2024

The Honorable Lee G. Dunst  
United States Magistrate Judge, EDNY  
100 Federal Plaza, Courtroom 830  
Central Islip, New York 11722

Re: *Hasper v. County of Nassau et. al.*  
20cv2349 (RER)(LGD)

Your Honor:

As the Court is aware, this office has recently been hired as substitute counsel for plaintiff William Hasper in the above-referenced matter. Please accept this correspondence as the parties' joint submission in accordance with the Court's May 20, 2024, Scheduling Order directing a detailed proposal regarding the completion of fact discovery. (see DE 61)

The parties have once again conferred and discussed the status of discovery and our need to seek a reasonable extension. At the outset, plaintiff's counsel reiterates that we are currently reviewing the voluminous files that we just recently received.

Counsel have discussed proposed deposition dates for the named Nassau County Police Officer defendants. To date, a number of non-party witnesses have been examined and the named defendants are next in line.

As currently scheduled, fact depositions are to be completed by September 1, 2024. (see DE 58). To that end, the County has provided the following dates on which we believe many of the named parties can be deposed: July 12, July 19, July 30, August 5, August 6, August 8, August 12, August 19 and August 20.

Nevertheless, considering the minimum of eight named defendants, and the anticipated summer vacation season approaching that may hamper the availability of some witnesses, the parties believe an extension will be necessary.

Furthermore, I am currently scheduled to begin a jury trial in the matter of *U.S.A. v. George Papaioannou* (22cr36) before the Honorable Joan M. Azrack on September 9, 2024. This case involves complex allegations of stolen goods, wire fraud and money laundering.

Finally, I am also scheduled to commence a New York State murder trial in the first week of November in the matter of *People of the State of New York v. Joseph Scalfani* in Suffolk County Supreme Court.

It is with this backdrop that the parties believe there is good cause for an extension until December 1, 2024, to allow counsel to complete fact depositions. The parties have conferred in good faith and share the same priority of moving this case forward as expeditiously as possible.

Thank you in advance for your consideration of this matter.

Respectfully submitted,

*Anthony M. La Pinta*

ANTHONY M. LA PINTA

cc: All Parties (By ECF)